

EXHIBIT 1

INTRODUCTION

Respondent Richard Griffin was a successful candidate for Richmond City Council in a local election held on November 6, 2001. Respondent Richard Griffin first served on the Richmond City Council from 1981 to 1983, and has been a councilmember from 1985 to present. Respondent Committee to Re-Elect Richard Griffin (“Committee”) was Respondent Richard Griffin’s controlled committee. Respondent Bettye C. Griffin served as treasurer of Respondent Committee. This case arose out of a pro-active investigation of possible campaign violations made in connection with the November 6, 2001 City of Richmond election.

The Political Reform Act (the “Act”)¹ requires candidates, their controlled committees, and the treasurers of those committees to file periodic campaign statements that disclose specified information with respect to contributions and expenditures of \$100 or more, and to maintain detailed accounts, records, bills, and receipts that are necessary to prepare those campaign statements. The Act also imposes certain restrictions on the use of campaign funds and prohibits cash expenditures of \$100 or more. In this matter, Respondents failed to comply with these campaign requirements.

For purposes of this stipulation, Respondents’ violations of the Act are stated as follows:

COUNT 1: Respondents Richard Griffin, Committee to Re-Elect Richard Griffin, and Bettye C. Griffin failed to maintain detailed accounts, records, bills, and receipts that were necessary to prepare campaign statements for the reporting periods from January 1, 2001 through December 31, 2001, in violation of section 84104.

COUNT 2: Respondents Richard Griffin, Committee to Re-Elect Richard Griffin, and Bettye C. Griffin failed to properly itemize 28 contributions of \$100 or more, totaling approximately \$10,032, in a semi-annual campaign statement for the reporting period from January 1, 2001 through June 30, 2001, filed on July 16, 2001, in violation of section 84211, subdivision (f).

COUNT 3: Respondents Richard Griffin, Committee to Re-Elect Richard Griffin, and Bettye C. Griffin failed to properly itemize 13 expenditures of \$100 or more, totaling approximately \$13,672, in a first pre-election campaign statement for the reporting period from

¹ The Political Reform Act is contained in Government Code sections 81000 through 91014. All statutory references are to the Government Code, unless otherwise indicated. The regulations of the Fair Political Practices Commission are contained in sections 18109 through 18997 of title 2 of the California Code of Regulations. All regulatory references are to title 2, division 6 of the California Code of Regulations, unless otherwise indicated.

July 1, 2001 through September 22, 2001, filed on September 27, 2001, in violation of section 84211, subdivision (k).

- COUNT 4: Respondents Richard Griffin, Committee to Re-Elect Richard Griffin, and Bettye C. Griffin failed to properly itemize seven contributions of \$100 or more, totaling approximately \$4,100, in a second pre-election campaign statement for the reporting period from September 23, 2001 through October 20, 2001, filed on October 26, 2001, in violation of section 84211, subdivision (f).
- COUNT 5: Respondents Richard Griffin, Committee to Re-Elect Richard Griffin, and Bettye C. Griffin failed to properly itemize 10 expenditures of \$100 or more, totaling approximately \$11,955, in a second pre-election campaign statement for the reporting period from September 23, 2001 through October 20, 2001, filed on October 26, 2001, in violation of section 84211, subdivision (k).
- COUNT 6: Respondents Richard Griffin, Committee to Re-Elect Richard Griffin, and Bettye C. Griffin failed to disclose a \$1,000 late contribution received from Archer Norris on or about October 22, 2001 to October 24, 2001, and a \$1,000 contribution received from BP Corporation North America Inc. on or about October 24, 2001 to November 5, 2001, in properly filed late contribution reports, in violation of section 84203.
- COUNT 7: Respondents Richard Griffin, Committee to Re-Elect Richard Griffin, and Bettye C. Griffin failed to properly itemize seven expenditures of \$100 or more, totaling approximately \$6,474, in a post-election semi-annual campaign statement for the reporting period from October 21, 2001 through December 31, 2001, filed on January 29, 2002, in violation of section 84211, subdivision (k).
- COUNT 8: On or about January 17, 2002, Respondents Richard Griffin, Committee to Re-Elect Richard Griffin, and Bettye C. Griffin improperly reimbursed Respondent Richard Griffin \$3,000 for personal funds he paid for attorney fees, in violation of section 89511.5, subdivisions (b) and (d).
- COUNT 9: Respondents Richard Griffin, Committee to Re-Elect Richard Griffin, and Bettye C. Griffin failed to maintain detailed accounts, records, bills, and receipts that were necessary to prepare semi-annual campaign statements for the reporting periods from January 1, 2002 through December 31, 2002, in violation of section 84104.
- COUNT 10: Respondents Richard Griffin, Committee to Re-Elect Richard Griffin, and Bettye C. Griffin failed to properly itemize six

contributions of \$100 or more, totaling approximately \$5,000, on a semi-annual campaign statement for the reporting period from January 1, 2002 through June 30, 2002, filed on July 29, 2002, in violation of section 84211, subdivision (f).

COUNT 11: Respondents Richard Griffin, Committee to Re-Elect Richard Griffin, and Bettye C. Griffin failed to maintain detailed accounts, records, bills, and receipts that were necessary to prepare semi-annual campaign statements for the reporting periods from January 1, 2003 through December 31, 2003, in violation of section 84104.

COUNT 12: Respondents Richard Griffin, Committee to Re-Elect Richard Griffin, and Bettye C. Griffin failed to properly itemize 12 expenditures of \$100 or more, totaling approximately \$4,976, in a semi-annual campaign statement for the reporting period from January 1, 2003 through June 30, 2003, filed on July 24, 2003, in violation of section 84211, subdivision (k).

COUNT 13: Respondents Richard Griffin, Committee to Re-Elect Richard Griffin, and Bettye C. Griffin failed to properly itemize 18 expenditures of \$100 or more, totaling approximately \$7,971, in a semi-annual campaign statement for the reporting period from July 1, 2003 through December 31, 2003, filed on January 27, 2004, in violation of section 84211, subdivision (k).

COUNT 14: From January 1, 2001 through December 31, 2003, Respondents Richard Griffin, Committee to Re-Elect Richard Griffin, and Bettye C. Griffin made 12 cash expenditures of \$100 or more, totaling approximately \$7,508, in violation of section 84300, subdivision (b).

SUMMARY OF THE LAW

An express purpose of the Act, as stated in section 81002, subdivision (a), is to ensure that contributions and expenditures affecting election campaigns are fully and truthfully disclosed to the public, so that voters will be better informed and improper practices inhibited. To that end, the Act sets forth a comprehensive campaign reporting system designed to accomplish this purpose of disclosure.

Duty to Maintain Campaign Records

To ensure accurate disclosure of campaign activity, section 84104 requires candidates, treasurers and their controlled committees to maintain detailed accounts, records, bills, and receipts that are necessary to prepare campaign statements, to establish that campaign statements were properly filed, and to comply with the campaign disclosure provisions of the Act.

For campaign contributions of \$25 or more, regulation 18401, subdivision (a) requires candidates and controlled committees to maintain in their records the date of each contribution, the amount, and the full name and street address of the contributor, and original source documentation, including all bank statements, copies of contributor checks, contributor cards, cashier's checks, money orders, wire transfers, deposit slips, and any other documents, reflecting all items deposited to any campaign bank account. The accounts and records must also contain the cumulative amount received from the contributor. For campaign contributions received of \$100 or more, the records must contain the contributor's occupation and employer information.

For all campaign expenditures of \$25 or more, regulation 18401, subdivision (a) requires candidates and their controlled committees to maintain original source documentation containing the date the expenditure was made, the amount of the expenditure, the full name and street address of the payee, and a description of the goods or services for which each expenditure was made. Original source documentation consists of cancelled checks, wire transfers, credit card charge slips, bills, receipts, invoices, statements, vouchers, and any other documents reflecting obligations incurred by the candidate, elected officer, campaign treasurer, or committee, and disbursements made from the campaign bank account.

The above-listed records must be maintained for a period of four years following the date the campaign statement to which they relate is filed. (Regulation 18401, subdivision (b).)

Duty to Itemize Contributions and Expenditures

Section 82013, subdivision (a) defines a "committee" as any person or combination of persons who directly or indirectly receives contributions totaling \$1,000 or more in a calendar year. This type of committee is commonly referred to as a "recipient" committee. Under section 82016, subdivision (a), a recipient committee that is controlled directly or indirectly by a candidate is a "controlled committee."

A recipient committee has the obligation to file periodic campaign statements disclosing contributions received and expenditures made by the committee during the reporting period covered by the campaign statement. Section 84200, subdivision (a) requires recipient committees to file two semi-annual campaign statements each year. The first semi-annual campaign statement covers the reporting period January 1 to June 30, and must be filed by July 31 of the same year. The second semi-annual campaign statement covers the reporting period July 1 to December 31, and must be filed by January 31 of the following year.

In addition, section 84200.5, subdivision (c) requires candidates and their controlled committees to file two pre-election campaign statements before an election in which the candidate appears on the ballot. The first pre-election reporting period ends 45 days before the election, and the campaign statement for that period is due no later than

40 days before the election, and the second pre-election reporting period ends 17 days before the election and the campaign statement for that period is due no later than 12 days before the election. (Section 84200.8.)

Section 84211, subdivision (f) requires candidates and their controlled committees to itemize on each campaign statement the following contributor information for contributions that total \$100 or more: (1) his or her full name and street address; (2) his or her occupation, and the name of his or her employer, or if self-employed, the name of his or her business; (3) the date and amount of each contribution; and (4) the cumulative amount of contributions received from the contributor.

For each expenditure of \$100 or more, section 84211, subdivision (k) requires candidates and their controlled committees to itemize on each campaign statement the following information about the expenditure: (1) the full name and street address of the payee; (2) the amount of the expenditure; and (3) a brief description of the consideration for which the expenditure was made.

Duty to File Late Contribution Reports

Under section 84203, subdivisions (a) and (b), when a candidate and his or her controlled committee receives a late contribution, the candidate and the committee must file a late contribution report disclosing the contribution within 24 hours of receiving the contribution. Section 82036 defines a “late contribution” as a contribution aggregating \$1,000 or more that is received before an election, but after the closing date of the last pre-election campaign statement that is required to be filed. A monetary contribution is “received” on the date that the committee, or the agent of the committee, obtains possession or control of the check or other negotiable instrument by which the contribution is made. (Regulation 18421.1, subdivision (c).) Under section 84200.8, for an election held on a date other than June or November of an even-numbered year, the late contribution reporting period covers the last 16 days before the election.

Reimbursement of Personal Funds for Incumbent Elected Officers

Section 89511.5, subdivision (b) provides for reimbursement to an incumbent elected officer for certain attorney fees paid with personal funds from a controlled committee campaign bank account if all the following conditions are met: (1) the expenditures are not “campaign expenses;” (2) the incumbent elected officer, prior to reimbursement, provides the treasurer of the committee with a dated receipt and a written description of each expenditure; and (3) reimbursement is paid within 90 days of the expenditure, in the case of a cash expenditure, or within 90 days of the end of the billing period in which it was included, in the case of an expenditure charged to a credit card or charge account.

Regulation 18525, subdivision (a) provides that “campaign expenses” are as follows: (1) payments for fundraising and campaign strategy expenses for election to a future term of office; (2) payments for mass mailings, political advertising, opinion polls

or surveys, and other communications in connection with election to a future term of office; (3) payments for services and actual expenses of political consultants, the campaign treasurer and other campaign staff, pollsters and other persons providing services directly in connection with a future election; and (4) payments for voter registration and get-out-the-vote drives.

Pursuant to section 89511.5, subdivision (d), if reimbursement is not paid within the time authorized, the expenditure must be reported on the campaign statement as a non-monetary contribution received on the 90th day after the expenditure is paid, or within 90 days of the end of the billing period in which it was included.

Prohibition Against Making Cash Expenditures

Under section 84300, subdivision (b), “[n]o expenditure of one hundred dollars (\$100) or more shall be made in cash.”

Treasurer Liability

Under section 81004, subdivision (b), section 84100, and regulation 18427, subdivision (a), it is the duty of a committee’s treasurer to ensure that the committee complies with all of the requirements of the Act concerning the receipt and expenditure of funds, and the reporting of such funds. A committee’s treasurer may be held jointly and severally liable, along with the committee, for any reporting violations committed by the committee. (Sections 83116.5 and 91006.)

SUMMARY OF THE FACTS

Respondent Richard Griffin was a successful candidate for Richmond City Council in a local election held on November 6, 2001. Respondent Richard Griffin has been on the Richmond City Council for 22 years. Respondent Bettye C. Griffin has been Respondent Committee’s treasurer for 15 years. Respondents received contributions totaling \$76,685, and made expenditures totaling \$72,487 from January 1, 2001 through December 31, 2003.

COUNTS 1, 9, and 11

Failure to Maintain Campaign Records

Pursuant to section 84104 and regulation 18401, subdivision (a), Respondents had a duty to maintain detailed information and original source documentation for each contribution of \$25 or more and for each expenditure of \$25 or more. Respondents failed to maintain these required records for contributions and expenditures reported on campaign statements filed for reporting periods from January 1, 2001 through December 31, 2003.

By failing to maintain required campaign records, Respondents violated section 84104.

COUNTS 2, 4, and 10

Failure to Properly Itemize Contributions of One Hundred Dollars or More

Respondents had a duty to itemize each contribution of \$100 or more made to the campaign of Respondent Richard Griffin under section 84211, subdivision (f).

Count 2

On July 16, 2001, Respondents filed a semi-annual campaign statement for the reporting period from January 1, 2001 through June 30, 2001. During this reporting period Respondents received 28 contributions of \$100 or more, totaling approximately \$10,032, for which they failed to disclose required contributor information.

By failing to disclose required contributor information for contributions of \$100 or more, Respondents violated section 84211, subdivision (f).

Count 4

On October 26, 2001, Respondents filed a pre-election campaign statement for the reporting period from September 23, 2001 through October 20, 2001. During this reporting period, Respondents received seven contributions of \$100 or more, totaling approximately \$4,100, for which they failed to disclose required contributor information.

By failing to disclose required contributor information for contributions of \$100 or more, Respondents violated section 84211, subdivision (f).

Count 10

On July 29, 2002, Respondents filed a semi-annual campaign statement for the reporting period from January 1, 2002 through June 30, 2002. During this reporting period Respondents received six contributions of \$100 or more, totaling approximately \$5,000, for which they failed to disclose required contributor information.

By failing to disclose required contributor information for contributions of \$100 or more, Respondents violated section 84211, subdivision (f).

COUNTS 3, 5, 7, 12, and 13

Failure to Properly Itemize Expenditures of One Hundred Dollars or More

Respondents had a duty to itemize each expenditure of \$100 or more made by Respondent Committee under section 84211, subdivision (k).

Count 3

On September 27, 2001, Respondents filed a first pre-election campaign statement for the reporting period July 1, 2001 through September 22, 2001, which reflects that

Respondents failed to disclose required information for 13 expenditures of \$100 or more, totaling approximately \$13,672. In five instances, Respondents failed to disclose the payee's name, but, instead reported as the payee what appears to be the description of the payment.

By failing to disclose required information for 13 expenditures of \$100 or more, Respondents violated section 84211, subdivision (k).

Count 5

On October 26, 2001, Respondents filed a second pre-election campaign statement for the reporting period September 23, 2001 through October 20, 2001, which reflects that Respondents failed to disclose required information for 10 expenditures of \$100 or more, totaling approximately \$11,955.

By failing to disclose required information for 10 expenditures of \$100 or more, Respondents violated section 84211, subdivision (k).

Count 7

On January 29, 2002, Respondents filed a post-election semi-annual campaign statement for the reporting period October 21, 2001 through December 31, 2001, which reflects that Respondents failed to disclose required information for seven expenditures of \$100 or more, totaling approximately \$6,474. In one instance, Respondents failed to disclose the payee's name, but, instead reported as the payee what appears to be the description of the payment.

By failing to disclose required information for seven expenditures of \$100 or more, Respondents violated section 84211, subdivision (k).

Count 12

On July 24, 2003, Respondents filed a semi-annual campaign statement for the reporting period January 1, 2003 through June 30, 2003, which reflects that Respondents failed to disclose required information for 12 expenditures of \$100 or more, totaling approximately \$4,976. In three instances, Respondents failed to disclose the payee's name, but, instead disclosed as the payee what appears to be the description of the payment.

By failing to disclose required information for 12 expenditures of \$100 or more, Respondents violated section 84211, subdivision (k).

Count 13

On January 27, 2004, Respondents filed a semi-annual campaign statement for the reporting period July 1, 2003 through December 31, 2003, which reflects that

Respondents failed to disclose required information for 18 expenditures of \$100 or more, totaling approximately \$7,971.

By failing to disclose required information for 18 expenditures of \$100 or more, Respondents violated section 84211, subdivision (k).

COUNT 6
Failure to File Late Contribution Reports

Respondents had a duty to file a late contribution report within 24 hours of receipt of a late contribution. The late contribution reporting period for the November 6, 2001 election was October 21, 2001 through November 5, 2001.

On or about October 22, 2001 to October 24, 2001, Respondents received a \$1,000 contribution check, dated October 22, 2001, from Archer Norris, which was deposited into Respondent Committee's bank account on October 24, 2001. On or about October 24, 2001 to November 5, 2001, Respondents received a \$1,000 contribution check, dated October 24, 2001, from BP Corporation North America Inc., which was deposited into Respondent Committee's bank account on November 5, 2001.

Respondents were required to report the late contributions on late contribution reports within 24 hours of receipt of the contributions. Therefore, Respondents should have filed late contribution reports disclosing the Archer Norris contribution at least by October 25, 2001, and the BP Corporation North America Inc. contribution at least by November 6, 2001. Instead, Respondents reported November 7, 2001 as the date they received the contributions on the post-election semi-annual statement for the reporting period of October 21, 2001 through December 31, 2001.

By failing to disclose late contributions on properly filed late contribution reports, Respondents violated section 84203, subdivision (a).

COUNT 8
Improper Reimbursement for an Expenditure of Personal Funds

On or about December 11, 1999, Respondent Richard Griffin used his personal funds to pay the law firm of Swanson & McNamara for professional legal services rendered from December 10, 1999 through February 21, 2001. Respondent Richard Griffin stated he had retained Swanson & McNamara for legal services related to a possible inspection of his campaign records by the Federal Bureau of Investigation.

On or about January 17, 2002, Respondents reported making an expenditure of \$3,000 to Respondent Richard Griffin as reimbursement for the December 11, 1999 payment to Swanson & McNamara, more than two years after the expenditure was initially made, and approximately nine months after the final invoice was submitted by Swanson & McNamara. Respondents also failed to report the expenditure as a non-

monetary contribution received on or about March 11, 2000 from Respondent Richard Griffin.

By reimbursing Respondent Richard Griffin for personal funds he used to pay Swanson & McNamara more than 90 days after the expenditure was made, and not reporting the expenditure as a non-monetary contribution from Respondent Richard Griffin, Respondents violated section 89511.5, subdivisions (b) and (d).

COUNT 14

Making Cash Expenditures of One Hundred Dollars or More

The Act prohibits candidates and committees from making cash expenditures of \$100 or more. According to records maintained by the City of Richmond City Clerk's office and those obtained from Respondents' bank, Respondents made 12 cash expenditures of \$100 or more during the reporting periods from January 1, 2001 through December 31, 2003, as set forth below:²

Check Date	Check Number	Payee	Amount	Check Memo	Description on Statement
02/11/01 cashed 04/11/01	1318	Richard Griffin	\$ 225.00	See (1318)	OFC, Postage, Envelopes
08/31/01	1343	Richard Griffin	1,000.00	Walking, Precincts, food	LIT, Walking Campaign Lit
09/05/01	1347	CASH	1,200.00	Walkers & food,	LIT, Walking Campaign Lit/Salaries Pops Food Etc.
10/17/01	1380	CASH	600.00	Distributing Literature	Campaign Workers Pop, Food, Sal ect.
10/29/01	1382	CASH	600.00	No Memo	SAL/OFC, Camp Walkers, Food, Postage, ect
No date, Cashed 11/05/01	1299	CASH	1,000.00	Walking ?? (illegible)	Walkers, Food, Gas & Pay Walkers
06/21/02	1429	CASH	300.00	Pass out flyers	Not reported
04/30/03	1440	CASH	300.00	Supplies & ?? (illegible)	OFC, Cash Postage & Paper/envelopes

² Entries for "Check Memo" and "Description on Statement" in this table appear as they are written on Respondents' checks and campaign statements.

05/(no day)/03, cashed 05/09/03	1441	CASH	300.00	No Memo	OFC, Office supplies and food for campaign workers
07/(??)/03, cashed 07/18/03	1003	CASH	400.00	No Memo	OFC, Cash office supplies ect. Staplers
08/06/03	1006	CASH	500.00	No Memo	POS
12/16/03	1021	CASH	1,083.00	Computer @ Cosco	Not Reported
Total			\$7,508.00		

By making twelve cash expenditures of \$100 or more, totaling approximately \$7,508, Respondents violated section 84300, subdivision (b).

CONCLUSION

This matter consists of 14 counts of violating the Act, which carry a maximum administrative penalty of \$5,000 per violation, for a total of \$70,000.

In determining the appropriate penalty for a particular violation of the Act, the Enforcement Division considers the typical treatment of a violation in the overall statutory scheme of the Act, with an emphasis on serving the purposes and intent of the Act. Additionally, the Enforcement Division considers the facts and circumstances of the violation in context of the factors set forth in regulation 18361.5, subdivision (d)(1)-(6): the seriousness of the violations; the presence or lack of intent to deceive the voting public; whether the violation was deliberate, negligent, or inadvertent; whether the Respondent demonstrated good faith in consulting with Commission staff; whether there was a pattern of violations; and whether the Respondent, upon learning of the violations, voluntarily filed appropriate amendments to provide full disclosure.

Regarding Counts 1, 9, and 11, administrative penalties for recordkeeping violations have historically ranged from the low to high end of the penalty range, depending on the circumstances. In this matter, while it does not appear that Respondents Richard Griffin and Bettye Griffin's actions were intentional, their negligence in failing to maintain required campaign records made it impossible for them to prepare and file complete and accurate campaign statements, or for their financial activities to be verified. Also, the violations occurred over a period of three years, which demonstrates a pattern of violations. Therefore, imposition of an administrative penalty in the amount of \$2,000 per violation is appropriate.

Regarding Counts 2, 4, and 10, the administrative penalty for the failure to disclose contributor information has generally been in the middle to high end of the penalty range. In this matter, there is no indication of intent to withhold information

from the public, and Respondents were never requested by their filing officer to correct these obvious errors and omissions in their statements. Also, Respondents have no prior history of violating the Act. However, Respondents should have known of this basic disclosure requirement that has been in effect since before Respondent Richard Griffin first took office. Respondents were negligent in failing to properly itemize a considerable portion of campaign contributions, which deprived the public of information regarding the financial activities of Respondents Richard Griffin and Committee. Based on the circumstances of these violations, imposition of an administrative penalty in the amount of \$2,500 per violation is appropriate.

Regarding Counts 3, 5, 7, 12, and 13, the administrative penalty for the failure to disclose required expenditure information has been in the low-to-middle end of the penalty range, depending on the circumstances of the case. In this matter, there is no indication of intent to withhold information from the public, and Respondents were never requested by their filing officer to correct these obvious errors and omissions in their statements. Also, Respondents have no prior history of violating the Act. However, Respondents were negligent in failing to properly itemize a significant portion of campaign expenditures, which deprived the public of information regarding the financial activities of Respondents Richard Griffin and Committee. Based on the circumstances of these violations, imposition of an administrative penalty in the amount of \$1,000 per violation is appropriate.

Regarding Count 6, the administrative penalty for failing to disclose a late contribution in cases resolved outside the Commission's Streamlined Late Contribution Enforcement Program is 15 to 25% of the amount of the undisclosed contribution, depending upon the circumstances of the violation. In this matter, Respondents received and deposited two \$1,000 contributions during the 16 days before the election. Respondents failed to disclose the contributions on late contribution reports and subsequently disclosed having received the contributions one day *after* the election. Therefore, imposition of an administrative penalty of \$500 is appropriate.

Regarding Count 8, the Commission has prosecuted one section 89511.5 violation, where a penalty in the mid-to-high end of the penalty range was imposed. In this matter it does not appear Respondents had any intent to conceal the expenditure or its reimbursement, but acted out of ignorance and/or indifference to the requirements in section 89511.5. Nor does it appear Respondents received a substantial personal benefit. Therefore, imposition of an administrative penalty in the middle of the penalty range of \$2,000 is appropriate.

Regarding Count 14, the administrative penalty for making cash expenditures has been in the mid-to-high end of the penalty range, depending on the circumstances of the case. Making a cash expenditure of \$100 or more is a serious violation, as it deprives the public of valuable information regarding the financial activities of candidates and committees. The Act's prohibition against making such an expenditure is a basic rule about which Respondents should have known. In this matter, over a period of three years, Respondents made 12 cash expenditures of \$100 or more totaling \$7,508. These

acts establish a pattern of violations and disregard for the disclosure requirements and stated purpose of the Act. Therefore, imposition of an administrative penalty in the amount of \$3,000 is appropriate for this violation.

Accordingly, the facts of this case justify a total administrative penalty of \$24,000 for Respondents' 14 violations of the Act.